

for Paul Hinschius to reclaim the *De privilegio chorepiscoporum* for Pseudo-Isidore in 1863, because he preferred the A1 version of the False Decretals, which, like the C version printed by Merlin, includes J<sup>3</sup> †1118 among Leo's letters<sup>3</sup>.

The relationship between Ps.-Leo and the canonical Pseudo-Isidorian forgeries proves to be a difficult and subtle problem. To begin with, Ps.-Leo does not present the complex mosaic of source material that mark Pseudo-Isidore's other concoctions. Instead, he draws primarily on one source, namely c. 7 of the Second Council of Seville from 619. Ps.-Leo outfits this brief text with epistolary trappings and several careless interpolations. Pseudo-Isidore, as it happens, also knows Seville II, c. 7; in his interpolated *Hispana* and in the second, conciliar part of his decretal forgeries, he even enhances the canon in much the same way as Ps.-Leo. Bizarrely, though, both forgers seem to have falsified the canon independently of each other, albeit towards the same ends. And while Ps.-Leo does occur in some versions of the decretal forgeries, a survey of its manuscript tradition reveals the Ps.-Leo recension we find in the collection of Pseudo-Isidore to be the product of later redaction. An earlier recension of J<sup>3</sup> †1118, beset by textual problems that the Pseudo-Isidorian tradition strives to correct, circulated beyond the confines of the False Decretals in five early medieval canonical manuscripts<sup>4</sup>.

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Grand (440–461) dans l'*Hispana* et la collection dite des Fausses Décrétales, *Revue de droit canonique* 25 (1975) p. 28–39, at p. 36f. The collection of Leo's letters in Merlin's edition is an antecedent of the arrangement in the C version, including the C version of the Paris codex.

3) See HINSCHIUS, *Decretales* (as n. 2) p. CIII–CIV, CXLIII–CXLV; and his edition at p. 628. For Horst FUHRMANN, *Einfluß und Verbreitung der pseudoisidorischen Fälschungen* (MGH *Schriften* 24, 1972–74), 3 Bde., Bd. 1, p. 187 with n. 10 (also IDEM, *Pseudo-Isidorian Forgeries*, in: *Papal Letters in the Early Middle Ages* [History of Medieval Canon Law 2, 2001] p. 135–196, at p. 167 with n. 117), its Pseudo-Isidorian origins are doubtful. Before him Emil SECKEL, *Pseudoisidor*, in: *Realencyklopädie für protestantische Theologie und Kirche* 16 (3<sup>1905</sup>) p. 271 had placed Ps.-Leo before the False Decretals, but appeared to accept it as a Pseudo-Isidorian creation.

4) Probably the best introduction to the Pseudo-Isidorian problem, precisely because it predates modern controversies, remains FUHRMANN, *Pseudo-Isidorian Forgeries* (as n. 3). In the decades since this introduction appeared, Klaus Zechiel-Eckes sought to upend the traditional view outlined there in a series of articles announcing and expanding upon his discovery of a Pseudo-Isidorian annotator in several ninth-century codices, including codices from Corbie. See especially Klaus ZECHIEL-ECKES, *Verecundus oder Pseudoisidor?*, *DA* 56 (2000) p. 413–446; IDEM, *Ein Blick in Pseudoisidors Werkstatt: Studien zum Entstehungsprozeß der Fälschen*